

Message

From: Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]
Sent: 10/4/2018 3:19:38 PM
To: Shavonne Vance [shavonnev@thinkenvironmental.com]
CC: Jeff Diehl [jeffd@thinkenvironmental.com]; Monty Smith [montys@thinkenvironmental.com]; Karl Shultz [karls@thinkenvironmental.com]
Subject: RE: OOOOa Question

Hi Shavonne,

Thank you for your email. Regarding your first question, switching the pneumatic controller to be gas-driven would likely trigger requirements in NSPS OOOOa if it is a continuous bleed controller (see 60.5365a(d)(2)). It is possible that this could fall under the category of the functional needs exemption found in 60.5390a(a) if the gas-actuated controller is needed to keep the plant operational. If your client is interested in a definitive response, they should reach out to the regional office for a formal applicability determination.

Regarding your second question, fugitive monitoring reporting is determined by the startup date and the quarters follow after the initial monitoring within 60 days of startup. The rule does not follow calendar quarters given that startup can occur at any time throughout the year.

Let me know if you have any additional questions.

Thanks,
Karen

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From: Shavonne Vance [mailto:shavonnev@thinkenvironmental.com]
Sent: Thursday, September 27, 2018 5:49 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Jeff Diehl <jeffd@thinkenvironmental.com>; Monty Smith <montys@thinkenvironmental.com>; Karl Shultz <karls@thinkenvironmental.com>
Subject: OOOOa Question

Good Evening Karen,

We have a client that operates a gas processing facility for which we maintain their LDAR compliance program. A couple of questions have arisen for which we would appreciate your help clarifying. The questions are as follows.

- 1) The site is currently subject to OOOO only and we are wondering if some recent changes would trigger OOOOa. The pneumatic controllers were air actuated when the site was permitted. Due to constant loss of power, which caused air loss, the site was shutting down frequently. They switched all of their air systems to gas so now they are using VOC. Would this change trigger the OOOOa regulation?

- 2) As it relates to compressor station OOOOa LDAR reports, are the reports to be submitted based on a calendar quarter, or on a specific date of startup?

Thank you in advance for any guidance you offer.

Thank you,

Shavonne Vance
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